

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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GURSEWAK SINGH

*Plaintiff,*

*-against-*

LINTECH ELECTRIC, INC., LINDEN J. TUDOR,

*Defendants.*

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GURSEWAK SINGH,

*Plaintiff,*

*-against-*

HOLLY TUDOR, LINDEN TUDOR,

*Defendants.*

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GURSEWAK SINGH,

*Plaintiff,*

*-against-*

HOLLY TUDOR, LINDEN TUDOR, TUDOR  
ENTERPRISE FAMILY LIMITED PARTNERSHIP,

*Defendants.*

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**PLEASE TAKE NOTICE** that upon the annexed Memorandum of Law dated January 8, 2021, together with the supporting affirmation of Jason Mizrahi, Esq. and the exhibits annexed thereto, Defendants Lintech Electric, Inc. (the “Lintech”), and Linden J. Tudor (“Mr. Tudor”, and together with Lintech, the “Defendants”), by and through their attorney Levin-Epstein & Associates, P.C. will move this Court, the Honorable Magistrate Judge Lois Bloom presiding, for

Case No.: 1:18-cv-05780

Hon. Magistrate Judge Lois Bloom

**NOTICE OF MOTION**

an order: (i) entering an award of attorneys' fees, costs, and sanctions pursuant to Federal Rules of Civil Procedure ("Fed.R.Civ.P.") 26(g)(3), 37(c), 28 U.S.C. § 1927, and the Court's inherent authority; (ii) striking the complaint dated December 16, 2018 filed by Plaintiff Gursewak Singh (the "Plaintiff"), with prejudice, pursuant to Fed.R.Civ.P. 37(b); and (iii) for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, must be served on or before March 12, 2021, and Defendants' reply must be served on or before March 30, 2021.

Dated: New York, New York  
January 8, 2021

Respectfully Submitted,

LEVIN EPSTEIN & ASSOCIATES, P.C.

/s/ Jason Mizrahi

Jason Mizrahi, Esq.

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*Attorneys for Defendants*

Cc: All parties via ECF